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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

C.T.,

Plaintiff,

v.

JASON FOSBERG, an individual; RED ROBIN
INTERNATIONAL, INC., a Nevada corporation,

Defendants.

Case No. 3:22-cv-00637

**DECLARATION OF ADAM A. KIEL IN
SUPPORT OF THE UNOPPOSED
MOTION FOR EXTENSION OF TIME
TO REPLY TO DEFENDANTS'
RESPONSE TO PLAINTIFF'S MOTION
TO REMAND**

I, Adam A. Kiel, hereby declare:

1. I am an attorney employed at the law firm of Kafoury McDougal, I am one of the attorneys of record for Plaintiff. I have personal knowledge of the matters set forth below and if called to testify, I would testify as follows:

2. Plaintiff requests additional time to reply to Defendants' Response to Plaintiff's Motion to Remand, until July 18, 2022.

3. This is the first request for an extension of time to file a Reply to Defendants' Response to Plaintiff's Motion to Remand.

4. This request is not made for the purpose of delay. The lead attorneys on this file, Jason Kafoury and Gregory Kafoury are currently out of the country on a prescheduled vacation. I am also leaving the country on a prescheduled vacation prior to the original July 8th deadline for the Reply, and thus we require additional time to formulate the Reply to the Response to the Motion to Remand.

5. Opposing counsel has agreed to stipulate to the extension of time for Plaintiff to file its reply.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Dated this June 28, 2022.

/s/ Adam Kiel

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CERTIFICATE OF SERVICE

I certify that on June 28, 2022, I served or caused to be served a true and complete copy of the foregoing **DECLARATION OF ADAM KIEL IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO REPLY TO DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO REMAND** on the party or parties listed below as follows:

X Via CM / ECF Filing

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/s/ Adam Kiel

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